

Exhibit 48

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
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4
5 MDL No. 16-2738 (FLW) (LHG)

6 IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
7 MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION
8


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11
12 VOLUME 2

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15 The remote video deposition of WILLIAM LONGO,
16 Ph.D., taken via Zoom videoconference on
17 May 3, 2024, commencing at approximately
18 9:07 a.m., before Lois Anne Robinson,
19 Certified Realtime Reporter.
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<p style="text-align: right;">Page 188</p> <p>1 A P P E A R A N C E S</p> <p>2 COUNSEL FOR PLAINTIFFS:</p> <p>3 BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.</p> <p>4 218 Commerce Street</p> <p>5 Montgomery, Alabama 36103</p> <p>6 BY: Leigh O'Dell, Esquire</p> <p>7 Leigh.odell@beasleyallen.com</p> <p>8 Leanna Pittard, Esquire</p> <p>9 Leanna.pittard@beasleyallen.com</p> <p>10 ASHCRAFT & GEREL</p> <p>11 1825 K Street NW, Suite 700</p> <p>12 Washington, DC 20006</p> <p>13 BY: Michelle A. Parfitt, Esquire</p> <p>14 Mparfitt@ashcraftlaw.com</p> <p>15 COHEN, PLACITLA & ROTH</p> <p>16 127 Maple Avenue</p> <p>17 Red Bank, New Jersey 07701</p> <p>18 BY: Christopher Placitella, Esquire</p> <p>19 Cplacitella@cprlaw.com</p> <p>20 Drew Renzi, Esquire</p> <p>21 Drenzi@cprlaw.com</p> <p>22 REILLY, McDEVITT & HENRICH, P.C.</p> <p>23 3 Executive Campus, Suite 310</p> <p>24 Cherry Hill, New Jersey 08002</p> <p>BY: Kevin Kotch, Esq.</p> <p>ANAPOL WEISS</p> <p>130 N 18th Street, Suite 1600</p> <p>Philadelphia, PA 19103</p> <p>BY: Tracy Finken, Esquire</p> <p>Tfinken@anapolweiss.com</p> <p>FOR THE DEFENDANT:</p> <p>KING & SPALDING</p> <p>1185 Avenue of the Americas</p> <p>34th Floor</p> <p>New York, New York 10036</p> <p>BY: John Ewald, Esquire</p> <p>Jewald@kslaw.com</p> <p>Jake Keester, Esquire</p> <p>Jkeester@kslaw.com</p>	<p style="text-align: right;">Page 190</p> <p>1 I N D E X</p> <p>2 EXAMINATION PAGE</p> <p>3 By Mr. Ewald 192</p> <p>4 By Ms. O'Dell 359</p> <p>5 By Mr. Ewald 374</p> <p>6 By Ms. O'Dell 379</p> <p>7 * * * * *</p> <p>8 EXHIBITS PAGE</p> <p>9 Exhibit 13 214</p> <p>10 "Characterization of elongate mineral particles, including</p> <p>11 talc, amphiboles, and biopyriboles observed in mineral</p> <p>12 derived powders..."</p> <p>13 Exhibit 14 228</p> <p>14 Newsome MAS M71722 - 11/17/23</p> <p>15 Exhibit 15 233</p> <p>16 Scope of Accreditation A2LA</p> <p>17 Exhibit 16 242</p> <p>18 Colorado School of Mines method</p> <p>19 Exhibit 17 247</p> <p>20 9/2/22 MAS report</p> <p>21 Exhibit 18 248</p> <p>22 Comparison of RIs and chrysotile structure size, Union</p> <p>23 Carbide's SG-210 chrysotile product from the Coalinga mine in</p> <p>24 California, Montana talc sourced for both Gold Bond...</p>
<p style="text-align: right;">Page 189</p> <p>1 A P P E A R A N C E S - (continue)</p> <p>2</p> <p>3 VIDEOGRAPHER: Zach Hone</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8 Lois Anne Robinson, RPR, RDR, CRR</p> <p>9 Court Reporter</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 191</p> <p>1 I N D E X - (continued)</p> <p>2 Exhibit 19 258</p> <p>3 USP 1901</p> <p>4 Exhibit 20 311</p> <p>5 July 2017 Conference - Wet Sieve Concentration Applied to</p> <p>6 Chrysotile in the Analysis of Talc for Asbestos</p> <p>7 Exhibit 21 321</p> <p>8 Invoice 11/9/23</p> <p>9 Exhibit 22 322</p> <p>10 Invoice 12/6/23</p> <p>11 Exhibit 23 322</p> <p>12 Invoice 2/5/24</p> <p>13 Exhibit 24 327</p> <p>14 Supplemental Expert report - May 2024</p> <p>15 Exhibit 25 333</p> <p>16 November 2023 MDL expert report</p> <p>17 Exhibit 26 345</p> <p>18 MAS Report M71740</p> <p>19 Exhibit 27 351</p> <p>20 ISO 22262-2</p> <p>21 Exhibit 28 375</p> <p>22 Appendices to White Paper</p> <p>23</p> <p>24</p>

<p style="text-align: right;">Page 316</p> <p>1 Talc is a soft material. If it wasn't, 2 it wouldn't be put in a container for people to 3 sprinkle it on their bodies. 4 "The more you grind, the more you can 5 find." You know, I don't know one way or the 6 other. So I don't have an opinion about that. 7 Q Okay. Here you have a slide 7 that 8 appears to be describing co-milling asbestos and 9 crushed talc. It says it's aggressively milled 10 30 minutes. 11 Anything comes out to you here, Doctor? 12 A No. That doesn't look anything like 13 ours. 14 Q Okay. And by that, you mean the 15 picture of what -- aggressively milled to 30 16 minutes? 17 A Yes. I mean -- 18 Q Okay. 19 A -- you know, I just -- I don't have any 20 information to really make an opinion one way or 21 the other. 22 Q Okay. I want to skip ahead to question 23 of what about short-fiber chrysotile (Calidria)? 24 Sample sent from Todd Ennis at RTI. It's on</p>	<p style="text-align: right;">Page 318</p> <p>1 chrysotile particle length? 2 A You know, it's -- this is not something 3 that we did any analysis on. I mean, I can't 4 really comment on it. It's somebody else's work. 5 Q Okay. 6 A So... 7 Q The slide on 18 is 100 ppm Calidria 8 chrysotile spiked into crushed talc, co-milled 30 9 minutes and sieved. Any comments on this one, 10 Doctor? 11 A Again, it's very hard for me to make 12 comments on something like this. It's other 13 people's work. 14 So what we had, you know, 10 micron 15 particles, and, you know, it's an image taken 16 with electronic -- you know, electronic image, 17 and then it's been put back on, and then we're 18 looking at it here. It's -- 19 It would be better for me to say -- 20 You know, I can't really comment on it. 21 I'd have to be sitting at the microscope when we 22 get, like, to this size. 23 Q Okay. 24 Okay. Here is what I propose.</p>
<p style="text-align: right;">Page 317</p> <p>1 slide 15. 2 And this describes, at least according 3 to the title, 500 ppm Calidria chrysotile spiked 4 with crushed -- into crushed talc, co-milled 30 5 minutes and sieved. 6 Any reactions to this in connection 7 with the chrysotile opinions you're offering, 8 Doctor, in particular that what you're seeing is 9 similar to chrysotile -- I mean Calidria? 10 MS. O'DELL: 11 Object to the form. 12 A Yes and no. I mean, we're seeing that 13 size in some of the RG-144 but not the SG-210. 14 And it doesn't look like, in that right one -- 15 I mean, I'm assuming this is under a -- 16 dispersion staining, and it's not the same size 17 that we're seeing. 18 MR. EWALD: 19 Q And what would you -- 20 Again, with all the caveats that if 21 you're looking at something, you know, not under 22 the microscope, this is a picture, but it does 23 have a bar, 10 microns for the parallel 24 direction, what would be your estimate on the</p>	<p style="text-align: right;">Page 319</p> <p>1 Let's -- 2 Can we go off the record? 3 MS. O'DELL: 4 Yes. 5 VIDEOGRAPHER: 6 Off record. Off record time is 12:29. 7 (OFF THE RECORD.) 8 VIDEOGRAPHER: 9 Back on record. Time is 1:09. 10 MR. EWALD: 11 Q You ready, Dr. Longo? 12 A Yeah, I'm ready. 13 Q Do you recall, Doctor, in connection 14 with the report that you issued earlier in the 15 MDL regarding amphibole testing, that MAS 16 conducted a coefficient of variation analysis? 17 A Coefficient of variation on the 18 counting, yes. 19 Q And has MAS conducted a comparable 20 coefficient of variation analysis for MAS's PLM 21 chrysotile method? 22 A No. Not yet. 23 Q Why not? 24 A Because we haven't quite got down, you</p>

<p style="text-align: right;">Page 320</p> <p>1 know, the system for the -- the most efficient 2 way to do this. So we don't have a coefficient 3 variation method yet. I mean analysis. 4 Q Do you know the rate of error of MAS's 5 PLM chrysotile method? 6 A Well, our overall rate of error used to 7 vary from about 5 to 10 -- plus or minus 5 to 10 8 percent for the last 35 years. 9 Q But was that measured specifically in 10 the context of the PLM chrysotile method? 11 MS. O'DELL: 12 Object to the form. 13 A No. 14 MR. EWALD: 15 Q Have you made any sort of analysis of 16 the tensile rate of error in connection with the 17 PLM chrysotile method MAS uses? 18 A No. I haven't gone down. I've done QC 19 on them just to verify that what he's finding is 20 chrysotile. But we'll probably start that, 21 because I think we're pretty close on the final 22 method. So we should have that pretty soon. 23 Q Do you know what, in the context of PLM 24 analysis, what the phrase "total reflection"</p>	<p style="text-align: right;">Page 322</p> <p>1 are. 2 Q Doctor, I'm gonna run through the 3 invoices that have been put up on the share site 4 that I didn't have yesterday. And, to be clear, 5 that was my fault, not Leigh's. 6 The first one we'll mark as Exhibit 21. 7 (DEPOSITION EXHIBIT NUMBER 21 8 WAS MARKED FOR IDENTIFICATION.) 9 MR. EWALD: 10 Q And it is MAS statement number 5891, 11 dated 11-9-2023. Total due, \$50,000. It has 12 case name of Carter Judkins. 13 Doctor, can you tell me what this is 14 for? 15 A This would be the retainer fee. 16 Q Okay. And explain to me how your 17 current approach is to retainer fees. 18 A All of my billable time, all my 19 expenses, travel time, et cetera, is billed off 20 of that. 21 Q And if on this particular case you 22 don't end up basically working enough hours to 23 reduce the \$50,000 to zero, do you keep the 24 remainder?</p>
<p style="text-align: right;">Page 321</p> <p>1 means? 2 MS. O'DELL: 3 Would you mind repeating that? 4 MR. EWALD: 5 Q Do you know, Dr. Longo, in the context 6 of PLM analysis, what the phrase "total 7 reflection" means? 8 A Typically, total reflection means 9 you're getting the majority, a hundred percent, 10 of the light beam refracted. 11 Q How, if at all, did the issue of total 12 reflection factor into your decision-making 13 process on the PLM chrysotile analysis? 14 A I factored zero in on that because we 15 were getting the amount of energy or rays or the 16 number of vibrations to produce the appropriate 17 refractive indices, as well as showing that when 18 we were -- with the same conditions, same 19 brightness, same everything, we would get 20 birefringence off the fibrous talc that is a 21 fivefold increase of what we were seeing 22 typically for the chrysotile, and it matched all 23 the literature I've ever looked at, what the 24 birefringence for fibrous talc or talc plates</p>	<p style="text-align: right;">Page 323</p> <p>1 A We do. We put that essentially in our 2 research fund. That's helped us to make so many 3 strides in being able to buy equipment that we 4 need. So we do keep it. 5 Q And how -- 6 Remind me how long you've had that 7 approach to retainer agreement. 8 A Since May 1st of last year. 9 (DEPOSITION EXHIBIT NUMBER 22 10 WAS MARKED FOR IDENTIFICATION.) 11 MR. EWALD: 12 Q All right. We have Exhibit 22 invoice, 13 and statement number 5981 dated December 6, 2023, 14 \$50,000, case name Pasquelina Rausa. 15 What is this invoice for? 16 A Well, Beasley Allen law firm, I'm 17 assuming it's maybe one of the MDLs -- 18 Q Okay. 19 A -- I guess. 20 (DEPOSITION EXHIBIT NUMBER 23 21 WAS MARKED FOR IDENTIFICATION.) 22 MR. EWALD: 23 Q And then we have another one we'll mark 24 as Exhibit 23. And this one, statement number</p>

<p style="text-align: right;">Page 380</p> <p>1 analysis in order to have interlaboratory 2 qualitative and quantitative studies of the MAS 3 PLM CS chrysotile method; right? 4 MS. O'DELL: 5 Object to the form. 6 A We're -- we are -- we have to finish up 7 the PLM and finish up the TEM to have some 8 interlaboratory control. But that's coming. 9 MR. EWALD: 10 Q Okay. No further questions. 11 A Okay. 12 EXAMINATION 13 BY MS. O'DELL: 14 Q One -- one follow-up. 15 What's your understanding of what the, 16 Dr. Longo, about what the IWGACP says about heavy 17 liquid density separation? Do they reject it as 18 not an appropriate methodology? 19 A No. They were talking about that. 20 This technique and this methodology has been 21 around since the 19th century and extensively 22 published, et cetera. This is -- this is not 23 something that is novel. The science of it has 24 been going on forever and ever. They're --</p>	<p style="text-align: right;">Page 382</p> <p>1 CERTIFICATE 2 3 I do hereby certify that the above and 4 foregoing transcript of proceedings in the matter 5 aforementioned was taken down by me in machine 6 shorthand, and the questions and answers thereto 7 were reduced to writing under my personal 8 supervision, and that the foregoing represents a 9 true and correct transcript of the proceedings 10 given by said witness upon said hearing. 11 I further certify that I am neither of 12 counsel nor of kin to the parties to the action, 13 nor am I in anywise interested in the result of 14 said cause. 15 16 17  18 /s:// Lois Anne Robinson 19 LOIS ANNE ROBINSON, RPR, RMR 20 REGISTERED DIPLOMATE REPORTER 21 CERTIFIED REALTIME REPORTER 22 23 24</p>
<p style="text-align: right;">Page 381</p> <p>1 So, in fact, the very last sentence 2 they said is "we strongly recommend that the HLS 3 for asbestos needs to be investigated," et 4 cetera. 5 So I saw it as, yes, we have to -- 6 there's things we need to do, but we need to look 7 at this method. Strongly suggests that that 8 method be used. 9 MS. O'DELL: 10 Nothing further. 11 MR. EWALD: 12 Me either. 13 THE WITNESS: 14 All right. 15 VIDEOGRAPHER: 16 Okay. Off record. Time is 2:55. 17 (Deposition concluded at 2:55 p.m.) 18 19 20 21 22 23 24</p>	